

EXHIBIT 4

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

**Case No. 3:23-md-3071
MDL No. 3071**

**THIS DOCUMENT RELATES TO:
3:23-CV-00440
3:23-CV-00742**

Chief Judge Waverly D. Crenshaw, Jr.

**DECLARATION OF THERESA MCFARLAND
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE**

I, Theresa McFarland, declare as follows:

1. I am the Senior Vice President and General Counsel for Prometheus Real Estate Group, Inc. ("Prometheus"). I submit this declaration in support of Defendants' Motion to Dismiss Tennessee Actions for Lack of Personal Jurisdiction and Improper Venue. I am familiar with the location of properties managed by Prometheus, and the general roles and responsibilities of Prometheus's property management employees. The facts stated herein are based on my personal knowledge and my review of records created and maintained by Prometheus.

2. Prometheus is incorporated in California with its principal place of business located at 1 North B Street, Suite 4000, San Mateo, CA 94401.

3. Prometheus is not registered to conduct business in the State of Tennessee.

4. Prometheus has never owned or managed any properties in the State of Tennessee and does not otherwise have any operations there.

5. Prometheus has never employed any employee in the State of Tennessee.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 9, 2023, in San Mateo, California.


Theresa McFarland